

JENNIFER L. FALK (#4568)
STEVEN G. LOOSLE (#4874)
KRUSE LANDA MAYCOCK & RICKS, LLC
136 East South Temple, Suite 2100
P. O. Box 45561
Salt Lake City, Utah 84145-0561
Telephone: (801) 531-7090
Facsimile: (801) 531-7091
Email: JFalk@klmrlaw.com
Email: SLoosle@klmrlaw.com

KELLI L. SAGER (*pro hac vice*)
MARY H. HAAS (*pro hac vice*)
DIANA PALACIOS (*pro hac vice*)
DAVIS WRIGHT TREMAINE LLP
865 S. Figueroa Street, Suite 2400
Los Angeles, CA 90017-2566
Telephone: (213) 633-6800
Facsimile: (213) 633-6899
Email: kellisager@dwt.com
Email: dianapalacios@dwt.com

Attorneys for Defendants Robert Duvall,
Robert Carliner, and Wild Horses Productions
Entertainment LLC

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

RIVERBEND RANCH EQUESTRIAN
CENTER LLC, a Utah Limited Liability
Company; and TAMARA RAE LARSEN, an
Individual,

Plaintiffs,

vs.

ROBERT DUVALL, an individual; ROBERT
CARLINER, an individual; WILD HORSES
PRODUCTIONS ENTERTAINMENT LLC, a
Canceled California Limited Liability
Company; and JOHN DOE DEFENDANTS
I - XX,

Defendants.

Civ. No.: 15-cv-00751-JNP-EJF

NOTICE OF PLAINTIFFS'
ACCEPTANCE OF OFFER OF
JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 68

WILD HORSES PRODUCTIONS
ENTERTAINMENT LLC, a Delaware
Limited Liability Company;

Counterclaimant,

vs.

RIVERBEND RANCH EQUESTRIAN
CENTER LLC, a Utah Limited Liability
Company; and TAMARA RAE LARSEN, an
Individual,

Counter-Defendants.

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, on May 18, 2017, plaintiffs Riverbend Ranch Equestrian Center, LLC and Tamara Rae Larsen accepted the Offer of Judgment Pursuant to Federal Rule of Civil Procedure 68 (“Offer”); a true and correct copy of executed Offer is attached to this Notice as **Exhibit A**.

DATED: June 27, 2017

KRUSE LANDA MAYCOCK & RICKS, LLC
JENNIFER L. FALK
STEVEN G. LOOSLE

DAVIS WRIGHT TREMAINE LLP
KELLI L. SAGER
MARY H. HAAS
DIANA PALACIOS

By: /S/ Mary H. Haas
Mary H. Haas

Attorneys for Defendants Robert Carliner,
Robert Duvall, and Wild Horses Productions
Entertainment LLC

Exhibit A

JENNIFER L. FALK (#4568)
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I - XX,

Defendants.

Civ. No.: 15-cv-00751-JNP-EJF

**DEFENDANTS' OFFER OF
JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 68**

AND RELATED COUNTERCLAIMS

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant Wild Horses Production Entertainment LLC ("WHPE") hereby offers to allow plaintiffs Tamara Rae Larsen and Riverbend Ranch Equestrian Center, LLC ("plaintiffs") to take a judgment against it in this action for the total sum of Forty-Five Thousand and One (\$45,001.00) Dollars, plus payment of actual statutory costs, including attorneys' fees reasonably and actually incurred to the date of this offer, as determined by the Court, according to proof. This offer is conditioned on both plaintiffs accepting the offer.

This judgment shall be in full satisfaction of all claims or rights that plaintiffs may have to damages, or any other form of relief, arising out of the alleged acts or omissions of defendants WHPE, Robert Duvall, and Robert Carliner, or any employee, representative or agent, either past or present, of WHPE.

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by any defendants, nor is it an admission that plaintiffs have suffered any damages.

Acceptance of this offer of judgment will act to release and discharge defendants WHPE, Robert Carliner and Robert Duvall and their successors or assigns; and all past and present, employees, representatives and agents of WHPE, from any and all claims that were or could have been alleged by plaintiffs in the above-referenced action.

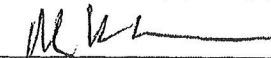
Pursuant to Rule 68 of the Federal Rules of Civil Procedure, if this offer is not accepted within 14 days, it is withdrawn by operation of law.

Evidence of this offer or of conduct or statements made relating to this offer is not admissible as evidence in any hearing. Fed. R. Evid. Rule 408.

DATED: May 2, 2017

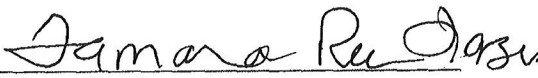
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DIANA PALACIOS

By: 
MARY H. HAAS

Attorneys for Defendants
Robert Carliner, Robert Duvall, and Wild
Horses Productions Entertainment LLC

ACCEPTED:
TAMARA RAE LARSEN

By:  Date May 18, 2017
Tamara Rae Larsen

RIVERBEND RANCH EQUESTRIAN CENTER, LLC

By:  Date May 18, 2017
Riverbend Ranch Equestrian Center, LLC

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On May 2, 2017, I served the foregoing document(s) described as: **DEFENDANTS' OFFER OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68** by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

Joann Shields
SHIELDS LAW FIRM, P.C.
13636 Vestry Road, Suite 1000
Draper, Utah 84020

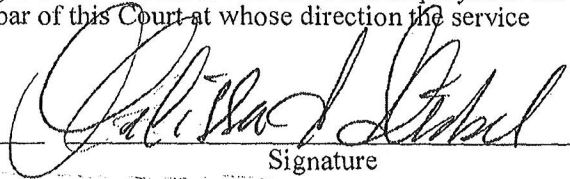
I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on May 2, 2017, at Los Angeles, California.

- ☐ State I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.
- ☒ Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

MELISSA A. STROBEL

Print Name


Signature